

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

LORRIE WILKINS, by her next friend, LIANKA )  
FONVILLE, )  
              )  
Plaintiff, )  
              )  
vs.           )  
              ) No. 07 C 7093  
LINCOLN PARK PLAZA, LLC., an Illinois )  
Corporation; BJB LINCOLN PARK, INC., an ) Judge Pallmeyer  
Illinois Corporation; BJB PARTNERS, LLC, an ) Magistrate Judge Cole  
Illinois Corporation; LINCOLN PARK PLAZA )  
MANAGEMENT SPE, INC., an Illinois )  
Corporation; DINO VUKIC, Property Manager )  
for Lincoln Park Plaza; and BETH CRUZ, )  
Assistant Property Manager for Lincoln Park )  
Plaza, )  
              )  
Defendants. )

**MOTION FOR DEFAULT**

Plaintiff, Lorrie Wilkins, by her next friend Lianka Fonville, and by and through her attorneys, the Legal Assistance Foundation of Metropolitan Chicago, pursuant to Rule 12 of the Federal Rules of Civil Procedure, moves this Court to hold the Defendants in default for their failure to file an Answer to Plaintiff's Complaint, and in support of her motion states as follows:

1. Plaintiff, Lorrie Wilkins, by her next friend Lianka Fonville, filed her Complaint on December 18, 2007.
2. Defendants were served with the Complaint on March 25, 2008 and March 27, 2008.
3. On April 7, 2008, Cary Schiff filed his Appearance on behalf of the Defendants.
4. On April 23, 2008, this Court ordered Defendants to answer or otherwise plead by

May 9, 2008.

5. Since April 2008, the parties have had numerous discussions regarding settlement and anticipated entering a settlement in the case in August 2008. Unfortunately, a settlement still has not been reached.

6. As of today's date, Defendants have not filed an Answer to the Complaint or otherwise plead.

WHEREFORE, Plaintiff respectfully requests that this Court:

- A. Enter an order finding Defendants in default and schedule a date for prove-up; and
- B. Grant any other relief that this Court deems just and proper.

Respectfully submitted,

/s/ Nareen Kim

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One of the Attorneys for Plaintiff

Attorneys for Plaintiff:

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